

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

REBECCA TERRY,

Plaintiff,

Case No. 17-CV-1112

v.

COUNTY OF MILWAUKEE, et al.,

Defendants.

DEFENDANT WENZEL'S SUPPLEMENTAL RESPONSE TO
PLAINTIFF'S FIRST SET OF INTERROGATORIES

Defendants Brian Wenzel supplements the prior responses to *Plaintiff's First Set of Interrogatories to County Defendants and Healthcare Defendants* as follows:

RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 2. Did you notify any medical staff on behalf of Rebecca Terry at any time on or about March 9-10, 2014? If so, please describe in detail why you did or did not notify medical staff and, if you did notify medical staff, when and who you notified.

RESPONSE: *Object to the request as vague as to the meaning of "medical staff."*
Subject to the objection, Mr. Wenzel notified Master Control at approximately 0444 on March 10, 2014, that Ms. Terry had given birth as reflected at page MKE Co. 171. Mr. Wenzel likely explained what he observed to the responding nursing staff and EMS personnel, but does not recall the details of those conversations at this time. There was no reason to notify medical staff prior to 0444, as there was no indication that Ms. Terry was in distress or required immediate medical attention.

INTERROGATORY NO. 3.

State whether you ever communicated with anyone (including Plaintiff) regarding Plaintiff's health, including but not limited to her pregnancy, labor, delivery, or post-partum care, and including any attempts by Plaintiff to communicate with you, even if you did not respond to such attempts. For each such Communication, state: (a) the date of the Communication; (b) with whom the Communication occurred; and (c) describe in detail the Communication. If you intend to answer by reference to documents, please state under oath that the documents contain all of the information responsive to this Interrogatory, and provide the relevant Bates Numbers.

RESPONSE: *Object to the request as vague and overly broad. Subject to the objection, Mr. Wenzel made visual contact with Ms. Terry repeatedly between her arrival in the Special Medical Unit at approximately 0145 and 0444, when he asked Master Control to call a medical emergency. He had limited verbal interactions with her, but does not recall the details of those conversations. Ms. Terry never requested any assistance or indicated that she was in any distress.*

AS TO OBJECTIONS:

Dated this 27th day of February, 2018.

LEIB KNOTT GAYNOR LLC

By: s/ Douglas S. Knott

Douglas S. Knott, SBN 1001600

Cory J. Brewer, SBN 1105913

Attorneys for Defendants Milwaukee County,

David A. Clarke, Brian Wenzel, Carolyn Exum

Morgan Bevenue and Margaret Hoover

219 N. Milwaukee Street, Suite 710

Milwaukee, WI 53202

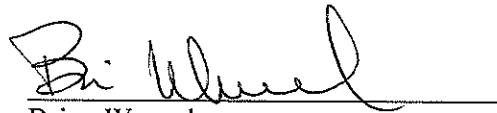
Telephone: (414) 276-2102

Fax (414) 276-2140

Email dknott@lkglaw.net

cbrewer@lkglaw.net

Dated this 1st day of March, 2018.


Brian Wenzel